

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS  
DOCKET NO.: 04CV-10357RCL

SHELDON G. ADELSON,  
Plaintiff,

v.

MOSHE HANANEL,  
Defendant.

**PLAINTIFF, SHELDON G. ADELSON'S, MOTION FOR LEAVE  
TO SUPPLEMENT THE RECORD**

The Plaintiff, Sheldon G. Adelson ("Adelson"), respectfully moves that this Honorable Court grant him leave to supplement the record by adding to it the accompanying "Affidavits in Lieu of Direct Testimony", which are all the Affidavits filed by or on behalf of the Defendant, Moshe Hananel ("Hananel"), in the three actions (including the counter-suit) in the Israeli Courts.

The Plaintiff also moves that this Honorable Court receive as a supplementation to the record, the Affidavit of Varant Hagopian, M.D., the Chair of the Department of Ophthalmology at the Mount Auburn Hospital in Cambridge, Massachusetts and the Director of the New England Eye Center at Mount Auburn Hospital. The letter from Dr. Hagopian is in affidavit form, and in it, Dr. Hagopian describes his analysis of the photographs and videos submitted to this court and his analysis and explanation of the two unsworn letters that Hananel has attached to his papers. Dr. Hagopian's opinion is contained therein.

As reasons for this motion, the Plaintiff says that the most contentious issue in the case appears to be the question of how many relevant witnesses reside in Israel. The Affidavits which

the Plaintiff wishes to submit in supplementation of the record are Affidavits that were filed in the three cases in Israel, and not one of them, other than those of Mr. Hananel, mentions either Macau or any claim relating to options of Mr. Hananel.

Respectfully submitted,  
The Plaintiff,  
SHELDON G. ADELSON,  
By his attorneys,

/s/ Albert P. Zabin

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Dated: January 30, 2006

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 30, 2006.

/s/ Albert P. Zabin

Albert P. Zabin